

Fill in this information to identify your case:

United States Bankruptcy Court for the:

EASTERN DISTRICT OF NEW YORK

Case number (if known)

Chapter 11

☐ Check if this an amended filing

Official Form 201

Voluntary Petition for Non-Individuals Filing for Bankruptcy

06/22

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write the debtor's name and the case number (if known). For more information, a separate document, *Instructions for Bankruptcy Forms for Non-Individuals*, is available.

1. Debtor's name Acorn Real Property Acquisition, Inc.

2. All other names debtor used in the last 8 years
Include any assumed names, trade names and doing business as names

3. Debtor's federal Employer Identification Number (EIN) 81-5264577

4. Debtor's address	Principal place of business	Mailing address, if different from principal place of business
	<u>118 Dixon Avenue</u> <u>Staten Island, NY 10303</u> Number, Street, City, State & ZIP Code	<u></u> P.O. Box, Number, Street, City, State & ZIP Code
	<u>Richmond</u> County	Location of principal assets, if different from principal place of business <u>3751 Martin Luther King Jr Drive SW Atlanta, GA</u> <u>30331</u> Number, Street, City, State & ZIP Code

5. Debtor's website (URL)

6. Type of debtor

☒ Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP))

☐ Partnership (excluding LLP)

☐ Other. Specify:

7. Describe debtor's business

A. Check one:

- ☐ Health Care Business (as defined in 11 U.S.C. § 101(27A))
☒ Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))
☐ Railroad (as defined in 11 U.S.C. § 101(44))
☐ Stockbroker (as defined in 11 U.S.C. § 101(53A))
☐ Commodity Broker (as defined in 11 U.S.C. § 101(6))
☐ Clearing Bank (as defined in 11 U.S.C. § 781(3))
☐ None of the above

B. Check all that apply

- ☐ Tax-exempt entity (as described in 26 U.S.C. § 501)
☐ Investment company, including hedge fund or pooled investment vehicle (as defined in 15 U.S.C. § 80a-3)
☐ Investment advisor (as defined in 15 U.S.C. § 80b-2(a)(11))

C. NAICS (North American Industry Classification System) 4-digit code that best describes debtor. See <http://www.uscourts.gov/four-digit-national-association-naics-codes>.

5311

8. Under which chapter of the Bankruptcy Code is the debtor filing?

Check one:

- ☐ Chapter 7
☐ Chapter 9

☒ Chapter 11. Check all that apply:

A debtor who is a "small business debtor" must check the first sub-box. A debtor as defined in § 1182(1) who elects to proceed under subchapter V of chapter 11 (whether or not the debtor is a "small business debtor") must check the second sub-box.

- ☐ The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D), and its aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$3,024,725. If this sub-box is selected, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if any of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
☐ The debtor is a debtor as defined in 11 U.S.C. § 1182(1), its aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$7,500,000, and it chooses to proceed under Subchapter V of Chapter 11. If this sub-box is selected, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return, or if any of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
☐ A plan is being filed with this petition.
☐ Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b).
☐ The debtor is required to file periodic reports (for example, 10K and 10Q) with the Securities and Exchange Commission according to § 13 or 15(d) of the Securities Exchange Act of 1934. File the Attachment to Voluntary Petition for Non-Individuals Filing for Bankruptcy under Chapter 11 (Official Form 201A) with this form.
☐ The debtor is a shell company as defined in the Securities Exchange Act of 1934 Rule 12b-2.

☐ Chapter 12

9. Were prior bankruptcy cases filed by or against the debtor within the last 8 years?

- ☒ No.
☐ Yes.

If more than 2 cases, attach a separate list.

District	_____	When	_____	Case number	_____
District	_____	When	_____	Case number	_____

Debtor Acorn Real Property Acquisition, Inc. Case number (if known) _____
Name

10. Are any bankruptcy cases pending or being filed by a business partner or an affiliate of the debtor? ☒ No ☐ Yes.

List all cases. If more than 1, attach a separate list

Debtor _____ Relationship _____
District _____ When _____ Case number, if known _____

11. Why is the case filed in this district? Check all that apply:
- ☒ Debtor has had its domicile, principal place of business, or principal assets in this district for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other district.
- ☐ A bankruptcy case concerning debtor's affiliate, general partner, or partnership is pending in this district.

12. Does the debtor own or have possession of any real property or personal property that needs immediate attention? ☒ No ☐ Yes.
- Answer below for each property that needs immediate attention. Attach additional sheets if needed.
- Why does the property need immediate attention?** (Check all that apply.)
- ☐ It poses or is alleged to pose a threat of imminent and identifiable hazard to public health or safety.
What is the hazard? _____
- ☐ It needs to be physically secured or protected from the weather.
- ☐ It includes perishable goods or assets that could quickly deteriorate or lose value without attention (for example, livestock, seasonal goods, meat, dairy, produce, or securities-related assets or other options).
- ☐ Other _____
- Where is the property?** _____
Number, Street, City, State & ZIP Code _____
- Is the property insured?**
- ☐ No
- ☐ Yes. Insurance agency _____
Contact name _____
Phone _____

Statistical and administrative information

13. Debtor's estimation of available funds Check one:
- ☒ Funds will be available for distribution to unsecured creditors.
- ☐ After any administrative expenses are paid, no funds will be available to unsecured creditors.

14. Estimated number of creditors
- | | | |
|------------------------------------------|----------------------------------------|--------------------------------------------|
| <input checked="" type="checkbox"/> 1-49 | <input type="checkbox"/> 1,000-5,000 | <input type="checkbox"/> 25,001-50,000 |
| <input type="checkbox"/> 50-99 | <input type="checkbox"/> 5001-10,000 | <input type="checkbox"/> 50,001-100,000 |
| <input type="checkbox"/> 100-199 | <input type="checkbox"/> 10,001-25,000 | <input type="checkbox"/> More than 100,000 |
| <input type="checkbox"/> 200-999 | | |

15. Estimated Assets
- | | | |
|--------------------------------------------------|-----------------------------------------------------------------|----------------------------------------------------------|
| <input type="checkbox"/> \$0 - \$50,000 | <input type="checkbox"/> \$1,000,001 - \$10 million | <input type="checkbox"/> \$500,000,001 - \$1 billion |
| <input type="checkbox"/> \$50,001 - \$100,000 | <input checked="" type="checkbox"/> \$10,000,001 - \$50 million | <input type="checkbox"/> \$1,000,000,001 - \$10 billion |
| <input type="checkbox"/> \$100,001 - \$500,000 | <input type="checkbox"/> \$50,000,001 - \$100 million | <input type="checkbox"/> \$10,000,000,001 - \$50 billion |
| <input type="checkbox"/> \$500,001 - \$1 million | <input type="checkbox"/> \$100,000,001 - \$500 million | <input type="checkbox"/> More than \$50 billion |

16. Estimated liabilities
- | | | |
|-----------------------------------------|-----------------------------------------------------|------------------------------------------------------|
| <input type="checkbox"/> \$0 - \$50,000 | <input type="checkbox"/> \$1,000,001 - \$10 million | <input type="checkbox"/> \$500,000,001 - \$1 billion |
|-----------------------------------------|-----------------------------------------------------|------------------------------------------------------|

Debtor

Acorn Real Property Acquisition, Inc.

Case number (if known)

Name

☐ \$50,001 - \$100,000

☐ \$100,001 - \$500,000

☐ \$500,001 - \$1 million

☒ \$10,000,001 - \$50 million

☐ \$50,000,001 - \$100 million

☐ \$100,000,001 - \$500 million

☐ \$1,000,000,001 - \$10 billion

☐ \$10,000,000,001 - \$50 billion

☐ More than \$50 billion

Debtor Acorn Real Property Acquisition, Inc. Case number (if known) _____
Name

Request for Relief, Declaration, and Signatures

WARNING -- Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

**17. Declaration and signature
of authorized
representative of debtor**

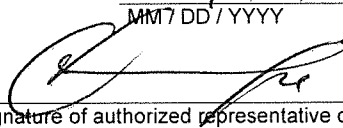
The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.

I have been authorized to file this petition on behalf of the debtor.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

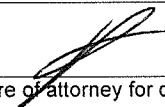
I declare under penalty of perjury that the foregoing is true and correct.

Executed on 10/31/22
MM/DD/YYYY

X 
Signature of authorized representative of debtor
Title President

Olakunle Apampa
Printed name

18. Signature of attorney

X 
Signature of attorney for debtor

Date 10/21/22
MM/DD/YYYY

Richard S Feinsilver
Printed name

Richard S Feinsilver, Esq.
Firm name

One Old Country Road
Suite 347
Carle Place, NY 11514
Number, Street, City, State & ZIP Code

Contact phone 516-873-6330

Email address feinlawny@yahoo.com

rf5531 NY
Bar number and State

United States Bankruptcy Court
Eastern District of New York

In re Acorn Real Property Acquisition, Inc.

Debtor(s)

Case No.

Chapter

11

STATEMENT REGARDING AUTHORITY TO SIGN AND FILE PETITION

I, **Olakunle Apampa**, declare under penalty of perjury that I am the **President** of **Acorn Real Property Acquisition, Inc.**, and that the following is a true and correct copy of the resolutions adopted by the Board of Directors of said corporation at a special meeting duly called and held on the 31st day of October, 2022.

"Whereas, it is in the best interest of this corporation to file a voluntary petition in the United States Bankruptcy Court pursuant to Chapter 11 of Title 11 of the United States Code;

Be It Therefore Resolved, that **Olakunle Apampa**, **President** of this Corporation, is authorized and directed to execute and deliver all documents necessary to perfect the filing of a chapter 11 voluntary bankruptcy case on behalf of the corporation; and

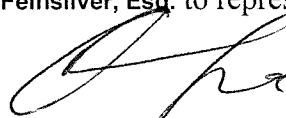
Be It Further Resolved, that **Olakunle Apampa**, **President** of this Corporation is authorized and directed to appear in all bankruptcy proceedings on behalf of the corporation, and to otherwise do and perform all acts and deeds and to execute and deliver all necessary documents on behalf of the corporation in connection with such bankruptcy case, and

Be It Further Resolved, that **Olakunle Apampa**, **President** of this Corporation is authorized and directed to employ **Richard S Feinsilver**, attorney and the law firm of **Richard S Feinsilver, Esq.** to represent the corporation in such bankruptcy case."

Date

10/31/22

Signed



Olakunle Apampa

Resolution of Board of Directors
of
Acorn Real Property Acquisition, Inc.

Whereas, it is in the best interest of this corporation to file a voluntary petition in the the United States Bankruptcy Court pursuant to Chapter 11 of Title 11 of the United States Code;

Be It Therefore Resolved, that **Olakunle Apampa, President** of this Corporation, is authorized and directed to execute and deliver all documents necessary to perfect the filing of a chapter 11 voluntary bankruptcy case on behalf of the corporation; and

Be It Further Resolved, that **Olakunle Apampa, President** of this Corporation is authorized and directed to appear in all bankruptcy proceedings on behalf of the corporation, and to otherwise do and perform all acts and deeds and to execute and deliver all necessary documents on behalf of the corporation in connection with such bankruptcy case, and

Be It Further Resolved, that **Olakunle Apampa, President** of this Corporation is authorized and directed to employ **Richard S Feinsilver**, attorney and the law firm of **Richard S Feinsilver, Esq.** to represent the corporation in such bankruptcy case.

Date 10/11/12

Signed 

Date _____

Signed _____

**United States Bankruptcy Court
Eastern District of New York**

In re Acorn Real Property Acquisition, Inc.

Debtor(s)

Case No.

Chapter

11

LIST OF EQUITY SECURITY HOLDERS

Following is the list of the Debtor's equity security holders which is prepared in accordance with rule 1007(a)(3) for filing in this Chapter 11 Case

Name and last known address or place of business of holder	Security Class	Number of Securities	Kind of Interest
OLAKUNLE APAMPA 118 DIXON AVENUE STATEN ISLAND, NY 10303	Common	200	100%

DECLARATION UNDER PENALTY OF PERJURY ON BEHALF OF CORPORATION OR PARTNERSHIP

I, the **President** of the corporation named as the debtor in this case, declare under penalty of perjury that I have read the foregoing List of Equity Security Holders and that it is true and correct to the best of my information and belief.

Date

10/31/12

Signature

Olakunle Apampa

*Penalty for making a false statement of concealing property: Fine of up to \$500,000 or imprisonment for up to 5 years or both.
18 U.S.C. §§ 152 and 3571.*

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

STATEMENT PURSUANT TO LOCAL BANKRUPTCY RULE 1073-2(b)

DEBTOR: ACORN REAL PROPERTY ACQUISITION, INC.

Pursuant to Local Bankruptcy Rule 1073-2(b), the debtor hereby makes the following disclosure concerning Related cases, to the petitioner's best knowledge, information and belief:

 X No related case is pending or has been pending at any time.

 X I am admitted to practice in the Eastern District of New York (Y/N): Y

CERTIFICATION:

I certify under penalty of perjury that the within bankruptcy case is not related to any case now pending or pending at any time, except as indicated elsewhere on this form.

Dated: October 31 2022

s/Richard S. Feinsilver 

Richard S. Feinsilver, Esq. (rf5531)

**United States Bankruptcy Court
Eastern District of New York**

In re Acorn Real Property Acquisition, Inc.

Debtor(s)

Case No. _____

Chapter 11

CORPORATE OWNERSHIP STATEMENT (RULE 7007.1)

Pursuant to Federal Rule of Bankruptcy Procedure 7007.1 and to enable the Judges to evaluate possible disqualification or recusal, the undersigned counsel for Acorn Real Property Acquisition, Inc. in the above captioned action, certifies that the following is a (are) corporation(s), other than the debtor or a governmental unit, that directly or indirectly own(s) 10% or more of any class of the corporation's(s') equity interests, or states that there are no entities to report under FRBP 7007.1:

☒ None [Check if applicable]

10/31/12

Date



Richard S Feinsilver

Signature of Attorney or Litigant

Counsel for Acorn Real Property Acquisition, Inc.

Richard S Feinsilver, Esq.

One Old Country Road

Suite 347

Carle Place, NY 11514

516-873-6330 Fax: 516-873-6183

feinlawny@yahoo.com

Fill in this information to identify the case:Debtor name Acorn Real Property Acquisition, Inc.United States Bankruptcy Court for the: EASTERN DISTRICT OF NEW YORK

Case number (if known) _____

☐ Check if this is an amended filing**Official Form 206A/B****Schedule A/B: Assets - Real and Personal Property**

12/15

Disclose all property, real and personal, which the debtor owns or in which the debtor has any other legal, equitable, or future interest. Include all property in which the debtor holds rights and powers exercisable for the debtor's own benefit. Also include assets and properties which have no book value, such as fully depreciated assets or assets that were not capitalized. In Schedule A/B, list any executory contracts or unexpired leases. Also list them on *Schedule G: Executory Contracts and Unexpired Leases* (Official Form 206G).

Be as complete and accurate as possible. If more space is needed, attach a separate sheet to this form. At the top of any pages added, write the debtor's name and case number (if known). Also identify the form and line number to which the additional information applies. If an additional sheet is attached, include the amounts from the attachment in the total for the pertinent part.

For Part 1 through Part 11, list each asset under the appropriate category or attach separate supporting schedules, such as a fixed asset schedule or depreciation schedule, that gives the details for each asset in a particular category. List each asset only once. In valuing the debtor's interest, do not deduct the value of secured claims. See the instructions to understand the terms used in this form.

Part 1: Cash and cash equivalents**1. Does the debtor have any cash or cash equivalents?**☐ No. Go to Part 2.☒ Yes Fill in the information below.

All cash or cash equivalents owned or controlled by the debtor

Current value of debtor's interest

3. Checking, savings, money market, or financial brokerage accounts (Identify all)

Name of institution (bank or brokerage firm)

Type of account

Last 4 digits of account number

3.1. ChaseChecking\$5,000.00**4. Other cash equivalents (Identify all)****5. Total of Part 1.**

Add lines 2 through 4 (including amounts on any additional sheets). Copy the total to line 80.

\$5,000.00**Part 2: Deposits and Prepayments****6. Does the debtor have any deposits or prepayments?**☒ No. Go to Part 3.☐ Yes Fill in the information below.**Part 3: Accounts receivable****10. Does the debtor have any accounts receivable?**☒ No. Go to Part 4.☐ Yes Fill in the information below.**Part 4: Investments****13. Does the debtor own any investments?**☒ No. Go to Part 5.☐ Yes Fill in the information below.

Debtor Acorn Real Property Acquisition, Inc.
Name

Case number (if known) _____

Part 5: Inventory, excluding agriculture assets

18. Does the debtor own any inventory (excluding agriculture assets)?

- ☒ No. Go to Part 6.
☐ Yes Fill in the information below.

Part 6: Farming and fishing-related assets (other than titled motor vehicles and land)

27. Does the debtor own or lease any farming and fishing-related assets (other than titled motor vehicles and land)?

- ☒ No. Go to Part 7.
☐ Yes Fill in the information below.

Part 7: Office furniture, fixtures, and equipment; and collectibles

38. Does the debtor own or lease any office furniture, fixtures, equipment, or collectibles?

- ☒ No. Go to Part 8.
☐ Yes Fill in the information below.

Part 8: Machinery, equipment, and vehicles

46. Does the debtor own or lease any machinery, equipment, or vehicles?

- ☒ No. Go to Part 9.
☐ Yes Fill in the information below.

Part 9: Real property

54. Does the debtor own or lease any real property?

- ☐ No. Go to Part 10.
☒ Yes Fill in the information below.

55. Any building, other improved real estate, or land which the debtor owns or in which the debtor has an interest

Description and location of property Include street address or other description such as Assessor Parcel Number (APN), and type of property (for example, acreage, factory, warehouse, apartment or office building, if available).	Nature and extent of debtor's interest in property	Net book value of debtor's interest (Where available)	Valuation method used for current value	Current value of debtor's interest
55.1. 100 Unit Residential Real Estate Complex: 3751 Martin Luther King Jr. Drive SW, Atlanta GA 30331	Fee simple	Unknown		\$18,000,000.00

56. Total of Part 9.

Add the current value on lines 55.1 through 55.6 and entries from any additional sheets.
Copy the total to line 88.

\$18,000,000.00

57. Is a depreciation schedule available for any of the property listed in Part 9?

- ☒ No
☐ Yes

Debtor Acorn Real Property Acquisition, Inc.
Name

Case number (if known) _____

58. Has any of the property listed in Part 9 been appraised by a professional within the last year?

- ☒ No
☐ Yes

Part 10: Intangibles and intellectual property

59. Does the debtor have any interests in intangibles or intellectual property?

- ☒ No. Go to Part 11.
☐ Yes Fill in the information below.

Part 11: All other assets

70. Does the debtor own any other assets that have not yet been reported on this form?

Include all interests in executory contracts and unexpired leases not previously reported on this form.

- ☒ No. Go to Part 12.
☐ Yes Fill in the information below.

Debtor Acorn Real Property Acquisition, Inc.
Name

Case number (if known) _____

Part 12: Summary

In Part 12 copy all of the totals from the earlier parts of the form

Type of property	Current value of personal property	Current value of real property
80. Cash, cash equivalents, and financial assets. <i>Copy line 5, Part 1</i>	<u>\$5,000.00</u>	
81. Deposits and prepayments. <i>Copy line 9, Part 2.</i>	<u>\$0.00</u>	
82. Accounts receivable. <i>Copy line 12, Part 3.</i>	<u>\$0.00</u>	
83. Investments. <i>Copy line 17, Part 4.</i>	<u>\$0.00</u>	
84. Inventory. <i>Copy line 23, Part 5.</i>	<u>\$0.00</u>	
85. Farming and fishing-related assets. <i>Copy line 33, Part 6.</i>	<u>\$0.00</u>	
86. Office furniture, fixtures, and equipment; and collectibles. <i>Copy line 43, Part 7.</i>	<u>\$0.00</u>	
87. Machinery, equipment, and vehicles. <i>Copy line 51, Part 8.</i>	<u>\$0.00</u>	
88. Real property. <i>Copy line 56, Part 9.....></i>		<div>\$18,000,000.00</div>
89. Intangibles and intellectual property. <i>Copy line 66, Part 10.</i>	<u>\$0.00</u>	
90. All other assets. <i>Copy line 78, Part 11.</i>	+ <u>\$0.00</u>	
91. Total. Add lines 80 through 90 for each column	<div>\$5,000.00</div>	+ 91b. <div>\$18,000,000.00</div>
92. Total of all property on Schedule A/B. Add lines 91a+91b=92		<div>\$18,005,000.00</div>

Fill in this information to identify the case:Debtor name Acorn Real Property Acquisition, Inc.United States Bankruptcy Court for the: EASTERN DISTRICT OF NEW YORK

Case number (if known) _____

☐ Check if this is an amended filing**Official Form 206D****Schedule D: Creditors Who Have Claims Secured by Property**

12/15

Be as complete and accurate as possible.

1. Do any creditors have claims secured by debtor's property?☐ No. Check this box and submit page 1 of this form to the court with debtor's other schedules. Debtor has nothing else to report on this form.☒ Yes. Fill in all of the information below.**Part 1: List Creditors Who Have Secured Claims**

2. List in alphabetical order all creditors who have secured claims. If a creditor has more than one secured claim, list the creditor separately for each claim.

Column A	Column B
Amount of claim	Value of collateral that supports this claim
Do not deduct the value of collateral.	
\$12,500,000.00	\$18,000,000.00

2.1 LEGACY LENDING LLC

Creditor's Name

**C/O BELL CARRINGTON
339 HEYWARD STREET
2ND FLOOR
COLUMBIA, SC 29201**

Creditor's mailing address

Creditor's email address, if known

Date debt was incurred

1/1/2018

Last 4 digits of account number

1013

Do multiple creditors have an interest in the same property?

☒ No☐ Yes. Specify each creditor, including this creditor and its relative priority.

Describe debtor's property that is subject to a lien

**100 Unit Residential Real Estate Complex:
3751 Martin Luther King Jr. Drive SW, Atlanta
GA 30331**

Describe the lien

Mortgage

Is the creditor an insider or related party?

☒ No☐ Yes

Is anyone else liable on this claim?

☒ No☐ Yes. Fill out *Schedule H: Codebtors* (Official Form 206H)

As of the petition filing date, the claim is:

Check all that apply

☐ Contingent☐ Unliquidated☐ Disputed

3. Total of the dollar amounts from Part 1, Column A, including the amounts from the Additional Page, if any.

**\$12,500,000.
00****Part 2: List Others to Be Notified for a Debt Already Listed in Part 1**

List in alphabetical order any others who must be notified for a debt already listed in Part 1. Examples of entities that may be listed are collection agencies, assignees of claims listed above, and attorneys for secured creditors.

If no others need to be notified for the debts listed in Part 1, do not fill out or submit this page. If additional pages are needed, copy this page.

Name and address

On which line in Part 1 did you enter the related creditor?

Last 4 digits of account number for this entity

**AHP SERVICING LLC
C/O BELL CARRINGTON
339 HEYWARD STREET
2ND FLOOR
COLUMBIA, SC 29201**Line **2.1**

Debtor Acorn Real Property Acquisition, Inc.
Name

Case number (if known) _____

AHP SERVICING LLC
440 S LASALLE STREET
SUITE 1110
CHICAGO, IL 60605

Line 2.1

United States Bankruptcy Court
Eastern District of New York

In re Acorn Real Property Acquisition, Inc.

Debtor(s)

Case No.

Chapter

11

DISCLOSURE OF COMPENSATION OF ATTORNEY FOR DEBTOR(S)

1. Pursuant to 11 U.S.C. § 329(a) and Fed. Bankr. P. 2016(b), I certify that I am the attorney for the above named debtor(s) and that compensation paid to me within one year before the filing of the petition in bankruptcy, or agreed to be paid to me, for services rendered or to be rendered on behalf of the debtor(s) in contemplation of or in connection with the bankruptcy case is as follows:

For legal services, I have agreed to accept	\$	<u>See Retainer</u>
Prior to the filing of this statement I have received	\$	<u>25,000.00</u>
Balance Due	\$	<u>See Retainer</u>

2. The source of the compensation paid to me was:

☒ Debtor ☐ Other (specify):

3. The source of compensation to be paid to me is:

☒ Debtor ☐ Other (specify):

4. ☒ I have not agreed to share the above-disclosed compensation with any other person unless they are members and associates of my law firm.

☐ I have agreed to share the above-disclosed compensation with a person or persons who are not members or associates of my law firm. A copy of the agreement, together with a list of the names of the people sharing in the compensation is attached.

5. In return for the above-disclosed fee, I have agreed to render legal service for all aspects of the bankruptcy case, including:

- a. Analysis of the debtor's financial situation, and rendering advice to the debtor in determining whether to file a petition in bankruptcy;
- b. Preparation and filing of any petition, schedules, statement of affairs and plan which may be required;
- c. Representation of the debtor at the meeting of creditors and confirmation hearing, and any adjourned hearings thereof;
- d. [Other provisions as needed]

See Retainer Agreement

6. By agreement with the debtor(s), the above-disclosed fee does not include the following service:

See Retainer Agreement

CERTIFICATION

I certify that the foregoing is a complete statement of any agreement or arrangement for payment to me for representation of the debtor(s) in this bankruptcy proceeding.

Date

10/31/14

Richard S Feinsilver

Signature of Attorney

Richard S Feinsilver, Esq.

One Old Country Road

Suite 347

Carle Place, NY 11514

516-873-6330 Fax: 516-873-6183

feinlawny@yahoo.com

Name of law firm

RETAINER

AGREEMENT, made the 31st day of October, 2022 by and between: Acorn Real Property Acquisition, Inc. (hereinafter referred to as "Client"); and RICHARD S. FEINSILVER, with offices at One Old Country Road, Carle Place, New York (hereinafter referred to as "Attorney").

1. RETAINER - Client agrees to retain Attorney and Attorney agrees to be retained by Client from this date to and including the conclusion or discontinuance of the below action, unless sooner terminated as provided in this Agreement.

2. NATURE OF SERVICES - The services to be rendered by Attorney under this Agreement shall be all those necessary or proper for the protection of Client's property and interest to the extent required by Client. For the purposes of clarification and without intending to be exclusive, the following is set down to illustrate the nature of legal work to be covered by this Agreement:

All work related to the Chapter 11 case entitled "In re Acorn Real Property Acquisition, Inc.", including (a) the preparation and filing of Chapter 11 petition, schedules and statements (except as noted below); (b) negotiations with creditors, if any (except as noted below); (c) attendance at all Section 341(a) Meetings with Creditors and U.S. Trustee; (d) Preparation of Plan and Disclosure Statement; (e) attendance at all hearings, including hearings on Status, Disclosure Statement and Confirmation; (f) Review of monthly Financial Statements - status conferences with client (as required); and (g) Post Confirmation Conferences with Trustee (if required).

Attorney may also be called upon by Client to commence, prosecute or defend collateral legal actions or arbitration proceedings or adversarial proceedings within either of the above bankruptcy actions which may involve additional work by Attorney, involving potential claims by creditors. The aforesaid shall also be considered within the scope of Attorney's services under this Retainer and shall be billed separately, subject to Order of the Court.

In addition, Attorney reserves the sole right to refer selected matters to outside counsel when it is determined, in the opinion of Attorney, that Client's best interest will be protected by representation by outside counsel, subject to Order of the Court.

3. ATTORNEY COMPENSATION - Attorney's compensation shall be an initial, minimum retaining fee of TWENTY FIVE THOUSAND (\$25,000.00) DOLLARS, against \$400.00 per billable hour.

In addition, Client shall reimburse Attorney for any and all reasonable and necessary expenses, including, but not limited to: filing fees, investigative fees, publishing costs or the disbursements, paid or incurred by Attorney on Client's behalf during the term of this Agreement, as approved by Order of the Court during the pendency of the subject case.

Client further understands, acknowledges and agrees that upon the depletion of the retainer paid hereunder, Attorney may make an application to the Bankruptcy Court for the payment of additional fees which may accrue hereunder. If any such application is granted, Client agrees to make prompt payment to Attorney within 10 days of the filing of any such Order.

4. TERMINATION - This Agreement may be terminated by either party earlier than the provision in Article One above, by providing the other party not less than thirty (30) days prior written notice of its intention to do so, or by Order of the Court.

In the event of the early termination of this Agreement, Client agrees to pay Attorney all sums due and owing as of the date of notice of said termination, subject to any conflicting Order of the Court.

5. SURVIVAL - If Client is a corporation, Attorney agrees that the obligations of Client corporation under this Agreement may be assigned to a successor corporation during the term of this Agreement. Client agrees that the successor corporation shall ratify this Agreement. Notwithstanding the above, the managing directors of Client corporation shall be bound, jointly and severally, as individuals, to the duties and obligations of Client under this Agreement.

6. AGREEMENT BY CORPORATION - If Client is a corporation, in consideration of the hereinabove, the Corporation agrees; (a) insofar as it is proper and required, it consents to the Agreement; and (b) a copy of this agreement shall continue in force for so long as the Corporation shall exist. The term corporation shall also include Limited Liability Company or Limited Liability Corporation.

IN WITNESS WHEREOF, the parties hereto have executed this Agreement of four pages, including this page, as of the date and year first written above.

Acorn Real Property Acquisition, Inc.

A handwritten signature in black ink, appearing to be 'O. Apampa', written over a horizontal line.

by: Olakunle Apampa, President

A handwritten signature in black ink, appearing to be 'R. Feinsilver', written over a horizontal line.

RICHARD S. FEINSILVER, ESQ.

**United States Bankruptcy Court
Eastern District of New York**

In re Acorn Real Property Acquisition, Inc.

Debtor(s)

Case No. _____

Chapter


11

VERIFICATION OF CREDITOR MATRIX

The above named debtor(s) or attorney for the debtor(s) hereby verify that the attached matrix (list of creditors) is true and correct to the best of their knowledge.

Date:

10/31/10



Olakunle Apampa/President

Signer/Title

Date:



Signature of Attorney

Richard S Feinsilver

Richard S Feinsilver, Esq.

One Old Country Road

Suite 347

Carle Place, NY 11514

516-873-6330 Fax: 516-873-6183

AHP SERVICING LLC
C/O BELL CARRINGTON
339 HEYWARD STREET
2ND FLOOR
COLUMBIA, SC 29201

AHP SERVICING LLC
440 S LASALLE STREET
SUITE 1110
CHICAGO, IL 60605

LEGACY LENDING LLC
C/O BELL CARRINGTON
339 HEYWARD STREET
2ND FLOOR
COLUMBIA, SC 29201